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Via ECF

The Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *De Los Santos Martinez v. 11 Kitchen Inc., et al.*, 1:24-cv-02851-VSB-SLC

Dear Judge Cave:

I represent Plaintiffs in the above-referenced matter. I write jointly with Defendants to respectfully request an additional thirty (30) days, until May 5, 2025, to finalize the settlement documents and submit the parties' motion for approval pursuant to *Cheeks v. Freeport Pancake House*, 796 F.3d 199 (2d Cir. 2015).

The parties have reached a settlement in principle and have now agreed upon the material payment terms. However, additional time is needed to circulate and finalize the written settlement agreement for execution. This is the first request for an extension of this deadline since the agreement in principle was reached, and the parties remain committed to finalizing the settlement promptly.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Lina Stillman
Lina Stillman, Esq.
Stillman Legal, P.C.
Counsel for Plaintiffs

cc: Stephen D. Hans, Esq. (via ECF)

The Letter-Motion at ECF No. 30 is GRANTED. By Monday, June 2, 2025, the parties shall file (1) a motion for settlement approval pursuant to *Cheeks v. Freeport Pancake House*, 796 F.3d 199 (2d Cir. 2015), or (2) a joint status letter advising the Court as to the status of settlement negotiations. The parties are reminded that they may consent to Magistrate Judge jurisdiction for purposes of *Cheeks* review.

The Clerk of Court is respectfully directed to close ECF No. 30.

SO ORDERED. 5/6/2025


SARAH L. CAVE
United States Magistrate Judge